

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

THOMAS CLOBES, an individual,)	
)	
Plaintiff,)	Case No. 0:23-cv-00158-NEB-DTS
)	
v.)	
)	
3M COMPANY,)	
)	
Defendant.)	
)	

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANT’S MOTION TO DISMISS**

Now comes Plaintiff Thomas Clobes (“Plaintiff”), though undersigned counsel, who respectfully moves this Court for additional time to respond to Defendant 3M Company’s (“Defendant”) pending Motion to Dismiss. This is Plaintiff’s first request for an extension of time.

Defendant filed their Motion to Dismiss on February 27, 2023, making Plaintiffs’ response brief due on or before March 20, 2023. Specifically, Plaintiff requests to extend the present deadline to file his response to Defendant’s Motion to Dismiss to March 27, 2023. Plaintiff agrees that Defendant’s time to submit a reply, if any, to Plaintiffs’ response should also be extended accordingly.

Plaintiff’s counsel has conferred with Defendant’s counsel and Defendant has no objection to a seven (7) day extension of Plaintiff’s deadline to respond to Defendant’s Motion to Dismiss. Counsel for both parties have acknowledged that an extension would require rescheduling the hearing on Defendant’s Motion to Dismiss currently set for April 10, 2023.

Defendant's counsel prefers, and Plaintiff's counsel are amenable to, rescheduling the hearing to occur on April 18, 2023, the afternoon of April 20, 2023, or April 21, 2023.

WHEREFORE, Plaintiff Thomas Clobes respectfully requests that he be granted an extension of time to respond to Defendant's Motion to Dismiss up to March 27, 2023.

Date: March 17, 2023

/s/ Lexis Anderson

Lexis Anderson, Esq.

Admitted pro hac vice

Texas Bar No. 24127016

Robert E. Barnes, Esq.

Tennessee BPR No. 020617

Admitted pro hac vice

BARNES LAW

700 South Flower Street, Suite 1000

Los Angeles, California 90017

Telephone: (310) 510-6211

Facsimile: (310) 510-6225

Email: lexisanderson@barneslawllp.com

Email: robertbarnes@barneslawllp.com

Francis Herbert White III, Esq.

Minn. Atty. #0396779

Francis White Law, PLLC

8362 Tamarack Village, Suite 119-220

Woodbury, MN 55125

(651) 829-1431 (office)

francis.white@franciswhitelaw.com

Attorneys for Plaintiff THOMAS CLOBES

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Plaintiff,)	Case No. 0:23-cv-00158-NEB-DTS
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**ORDER GRANTING PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO DEFENDANTS’ MOTION TO DISMISS**

Having considered the Plaintiff’s Unopposed Motion for Extension of Time to Respond to Defendant’s Motion to Dismiss, IT IS HEREBY ORDERED that Plaintiff’s Motion is GRANTED.

Plaintiff’s deadline to file a response to Defendant’s Motion to Dismiss is hereby due on or before March 27, 2022.

DATED: _____, 2023

Hon. Nancy E. Brasel
United States District Judge

CERTIFICATE OF SERVICE

I, Lexis Anderson, certify that on March 17, 2023, I served the attached **PLAINTIFF'S UNOPPOSED MOTION FOR EXTION OF TIME TO RESPOND TO DEFENDANT'S MOTION TO DISMISS**, by electronically filing the foregoing with the Clerk of the Court for the United States District Court for the District of Minnesota by using the CM/ECF system. Participants in the case are registered CM/ECF users, and service will be accomplished by the CM/ECF system.

/s/ Lexis Anderson

Lexis Anderson